

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

IRONNET, INC., *et al.*,¹

Debtors.

)
) Chapter 11
)
) Case No. 23-11710 (BLS)
)
) (Jointly Administered)
)
) Ref. Docket Nos. 12 & 47

**CERTIFICATION OF COUNSEL REGARDING PROPOSED FURTHER INTERIM
ORDER (A) AUTHORIZING THE DEBTORS TO (I) OBTAIN POSTPETITION
FINANCING AND (II) USE CASH COLLATERAL, (B) GRANTING LIENS AND
PROVIDING SUPERPRIORITY ADMINISTRATIVE EXPENSE CLAIMS,
(C) GRANTING ADEQUATE PROTECTION TO PREPETITION SECURED PARTIES,
(D) MODIFYING THE AUTOMATIC STAY, (E) SCHEDULING A FINAL HEARING,
AND (F) GRANTING RELATED RELIEF**

On October 12, 2023, the above-captioned affiliated debtors and debtors in possession (collectively, the “**Debtors**”) filed the *Debtors’ Emergency Motion for Entry of Interim and Final Orders (A) Authorizing the Debtors to (I) Obtain Postpetition Financing and (II) Use Cash Collateral, (B) Granting Liens and Providing Superpriority Administrative Expense Claims, (C) Granting Adequate Protection to Prepetition Secured Parties, (D) Modifying the Automatic Stay, (E) Scheduling a Final Hearing, and (F) Granting Related Relief* [Docket No. 12] (the “**DIP Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

On October 16, 2023, the Court entered an order granting the relief requested in the DIP Motion on an interim basis [Docket No. 47] (the “**Interim Order**”).² Pursuant to the Interim Order, the Court scheduled a hearing for November 14, 2023 at 1:00 p.m. (ET) (the “**Hearing**”).

¹ The Debtors in the above captioned chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: IronNet, Inc. (9446), IronNet Cybersecurity, Inc. (2655), IronNet International, LLC (7621), IronCAD LLC (1162), and HighDegree, LLC (8474). The Debtors’ corporate headquarters is located at 7900 Tysons One Place, Suite 400, McLean, VA 22102.

² Capitalized terms used but not defined herein have the meanings given to them in the Interim Order.

to consider the DIP Motion on a final basis, which Hearing was subsequently adjourned to November 21, 2023 at 2:00 p.m. (ET).

Prior to the Hearing, the Debtors conferred with counsel to the DIP Lenders and counsel to 3i, LP and agreed to adjourn consideration of the DIP Motion on a final basis to November 28, 2023 at 11:00 a.m. (ET) to provide additional time for the parties to negotiate a consensual resolution of the DIP Motion and related issues. In furtherance thereof, the Debtors prepared a further Interim Order (the “**Proposed Further Interim Order**”), attached hereto as **Exhibit 1**, to provide additional funding to the Debtors while the final order is negotiated. For the convenience of the Court and interested parties, a blackline comparing the Proposed Further Interim Order to the Interim Order is attached hereto as **Exhibit 2**. The Debtors shared the Proposed Further Interim Order with counsel to the DIP Lenders, counsel to 3i, LP, and the Office of the United States Trustee for the District of Delaware, and such parties do not object to its entry.

Accordingly, the Debtors hereby submit the Proposed Further Interim Order and respectfully request that the Court enter the Proposed Further Interim Order at its earliest convenience without further notice or a hearing.

[Signature Page Follows]

Dated: November 20, 2023
Wilmington, Delaware

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